

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

|                                |   |                         |
|--------------------------------|---|-------------------------|
| In re:                         | § | Chapter 11              |
|                                | § |                         |
| PASO DEL NORTE MATERIALS, LLC, | § | Case No. 23-30252-hcm11 |
|                                | § |                         |
| Debtor.                        | § |                         |

**MOTION OF 1ST SOURCE BANK FOR WITNESS TO APPEAR BY WEBEX**

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

1st Source Bank ("1st Source") files this *Motion of 1st Source Bank for Witness to Appear by WebEx* (the "Motion") and respectfully requests as follows:

1. On May 18, 2023, 1st Source filed its *Motion of 1st Source Bank for Relief from the Automatic Stay, or Alternatively, for Adequate Protection and Waiver of 30-Day Requirement* [Docket No. 63] (the "1st Source Stay Motion"). A hearing on the 1st Source Stay Motion is scheduled for Wednesday, June 28, 2023 at 1:00 p.m. prevailing Mountain Time (the "Hearing").

2. 1st Source requests that Courtney Rhoades, a Loan Workout Officer and Assistant Vice President for 1st Source Bank, be allowed to provide witness testimony at the Hearing via WebEx.

3. Ms. Rhoades is located in Indiana and it would be expensive and time-consuming for Ms. Rhoades to travel from Indiana to El Paso to attend the Hearing in person.

4. The undersigned counsel for 1st Source will be responsible for instructing Ms. Rhoades on the proper rules and procedures for testifying via WebEx.

5. No parties will be prejudiced by Ms. Rhoades' electronic appearance as she will be available for examination by the Court and any interested parties present at the Hearing.

WHEREFORE, 1st Source respectfully requests the Court (i) enter an order authorizing Ms. Rhoades to appear via WebEx as a witness at the Hearing, and (ii) for such other and further relief as may be just.

Dated: June 21, 2023

**HAYNES AND BOONE, LLP**

/s/ Jarom J. Yates

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**ATTORNEYS FOR 1ST SOURCE  
BANK**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 21, 2023, a true and correct copy of the foregoing document was served (i) by electronic mail (where indicated) or first class mail, postage prepaid, on the parties listed below, and (ii) by electronic mail to the parties registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

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/s/ Jarom J. Yates  
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